

## **Air Carrier Certification Consultant Program For 14 CFR Part 121 Air Carrier Applicants**

Welcome to the Certification Consultant Web site. This site provides guidance on the eligibility requirements and application process to become a certification consultant. Individual topics can be navigated directly by the use of convenient page links. To make the consultant program better, FAA welcomes your comments. Written comments about this site and program can be sent to the same address as the application package.

A certification consultant is an organization that provides consultant services to prospective part 121 applicants. Once qualified by FAA, a certification consultant will be listed on the FAA Website. The intent of the 14 CFR part 121 Certification Consultant Program is to advance the Federal Aviation Administration (FAA) mission by assisting air carrier applicants that request the services of an eligible consultant to assist them with the certification process. This process will benefit the public by ensuring new entrant airlines are not delayed during the start of operations, and further ensures that the limited resources of the Administrator are effectively and efficiently utilized during the certification process.

The part 121 certification process is extremely complex and the success of the process is predicated upon the quality of the application. Historically, air carrier applicants have required extensive guidance and oversight from the FAA to get through the process. The FAA is committed to providing certification services; however, safety is the agency's first priority. Consequently, a certification consultant must realize that the preparation for Formal Application and System Verification consists of much more than manual preparation and revision. Preparing an air carrier for certification includes supporting and actively fostering the FAA's mission of incorporating system safety principles into airline organizations.

Unfortunately, increased attrition and a reduced budget have resulted in fewer resources being available to assist new entrants in the certification process. As a result, the certification process is significantly delayed, and in many cases fails, because applicants need assistance beyond which the FAA can or should provide. In an effort to address this new entrant need, the FAA will qualify and maintain a list of certification consultants to assist new entrants in the certification process. Currently the FAA does not establish consultant eligibility for any certification tasks beyond the beginning of the Formal Application Meeting.

Before beginning the process, it is important to understand that the FAA does not and will not formally "designate" or "approve" the activities of the consultant group. Once eligibility requirements are met, FAA will notify the aviation community that the consultant group has met strict FAA professional standards by posting their name and contact information on the FAA's certification Web site.

## **FAA Authority to Establish Program**

The FAA is authorized to enter into a certification consultant agreement by 49 U.S.C. Section 106 (l)(6).

Type of Agreement. The Agreement is an "other transaction." It is not intended to be, nor must it be construed as, a partnership, corporation, or other business organization.

## **Authorizations and Prohibitions**

Once application and eligibility requirements are successfully completed, a certification consultant will be listed on the FAA public Web site. A listing on the Web site means the certification consultant has been found by the FAA to be qualified to assist an air carrier only through the beginning of the Formal Application Meeting.

There is no limitation placed on consulting services beyond Formal Application as long as the air carrier applicant is advised that the FAA recognized certification consultant service ends at the beginning of the Formal Application Meeting.

No certification consultant may advertise or otherwise offer to perform services using words such as "FAA approved" or "FAA designated" or words of similar meaning. A certification consultant is qualified and found "eligible" to be listed on the Web site. Advertising with words such as "approved" or "designated," are sufficient grounds for termination of the agreement.

A certification consultant group will not receive a formal FAA approval or designation from FAA.

## **Acronyms**

ATOS	Air Transportation Oversight System
CC	Certification Consultant
CPD	Certification Process Document
CSET	Certification, Standardization, and Evaluation Team
POC	Point of Contact

## **Glossary**

**Qualified Certification Consultant** – any number of persons who meet the eligibility requirements and have been qualified and identified by FAA as meeting the requirements. The signed Agreement will recognize the consultant group as having met specific requirements, and consequently will be posted on the FAA Certification Web site.

**Certification Consultant Program Manager** – the person or Point of Contact (POC), identified in the agreement. This person will be the program manager and POC for the consultant group and be responsible for all communications with FAA. The program

manager will be responsible for written correspondence, e-mails, reports, and other types of notifications. The functions cannot be delegated to any other person within the consultant group.

**Authorized Function** – the specific eligibility requirement that an individual(s) meets. The Agreement requires a statement be submitted identifying, by name, the person that meets each specific requirement. The failure of a consultant group to maintain authorized personnel who meet eligibility may result in removal from the FAA web site.

## **Useful Links**

ATOS Home Page:

[http://www.faa.gov/safety/programs\\_initiatives/oversight/atos/](http://www.faa.gov/safety/programs_initiatives/oversight/atos/)

FAA Flight Standards Service (AFS) Home Page:

[http://www.faa.gov/about/office\\_org/headquarters\\_offices/avs/offices/afs/](http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/)

Certification Process Document

[http://www.faa.gov/safety/programs\\_initiatives/oversight/atos/air\\_carrier/data\\_collection/](http://www.faa.gov/safety/programs_initiatives/oversight/atos/air_carrier/data_collection/)

# Certification Consultant Program Administration

## Application

A prospective certification consultant must submit a formal letter of request accompanied by the documents or statements listed below. At a minimum, there are 11 mandatory requirements that must be answered and verified. If applicable, other documents may be required, i.e., copies of contractual agreements that form the certification consultant group (Ref. contracting out in next section). All information provided by the applicant will be evaluated and used to determine eligibility.

### **1. Names and dates showing at least two years experience working with part 121 certification process for those persons who will perform authorized functions**

The FAA recognizes that the certification process presents unique challenges that many experienced air carrier personnel have never encountered. Individuals have spent their entire careers in air carrier operations and have never been involved in certification activities. It is rare to find air carrier personnel who have experience documenting air carrier processes and developing manual systems. Often, the high level of professionalism and specific experience that air carrier personnel possess is simply not sufficient to understand all the interrelated and complex air carrier systems to adequately develop internal and external airline systems and entire manual systems. Unquestionably, ongoing air carrier operations and initial certification activities are very different activities requiring different skill sets.

To adequately prepare the applicant for the process, the certification consultant must have an understanding of each step of the Flight Standards Certification Process Document (CPD), as revised, to include the individual appendixes.

Each person performing the authorized functions must submit a resume outlining the above experience. AFS-900 personnel will assess this knowledge and proficiency during the interview by having the individual discuss the certification process in detail.

### **2. Successful completion of FAA Course 25036, System Safety/ATOS Seminar or successful completion of both FAA Courses 22006, System Safety and 22007, Air Transportation Oversight System (ATOS), or equivalent for those persons who will perform authorized functions. (Names, course numbers, and dates of training required.)**

Many organizations have been sending their personnel to these courses for several years. The courses have been offered to air carrier personnel to enhance their understanding of system safety principles. Since air carriers of the future will be carriers under the FAA ATOS system of FAA regulatory oversight, the understanding of the many facets of ATOS is necessary. The courses are offered to the public for a nominal fee. Contact Joe Souza, Phone: (405)-954-4321. Written justification for equivalent training will be considered.

### **3. Ability to apply Flight Standards System Safety processes, including Risk Management to air carrier manual design**

The consultant applicant must have knowledge of, and the ability to incorporate the system safety principles and attributes into manual systems and airline processes. The consultant applicant should be prepared to discuss and demonstrate how they intend to introduce system safety principles to the corporate officers who have significant influence over corporate culture. Demonstration and application of the Data Collection Tools (DCTs), as revised, will also be required. Hazard and risk identification and the ability to incorporate these concepts and principles within an airline system are vital to the success of internal and external safety programs.

### **4. Operations and airworthiness personnel qualified through training, experience, and expertise in part 121 air carrier operations, or equivalent experience**

The understanding of air carrier systems is paramount to manual development and certification success. Having personnel with expertise in both operations and airworthiness functions is essential. These individuals may be part of the primary consulting organization or contracted. Should a certification consultant be a professional manual development or technical writing company, it would be necessary to employ or contract with qualified aviation personnel to fulfill the eligibility requirements of the consultant agreement. Although operations is most often associated with pilot and dispatcher tasks, the consultant should also have the ability to verify that other air carrier operations tasks have been developed satisfactorily. For example, cabin safety is an operations function that is routinely one of the most underdeveloped sections of the manual system.

### **5. Automation capabilities commensurate with the guidance contained in the Certification Process Document**

Presently, all written materials (manuals, contracts, documents, etc.,) required at the Formal Application Meeting must be presented to the FAA in Adobe Acrobat (PDF) format. The consultant must train the air carrier applicant to generate Adobe Acrobat (PDF) formatted files with no security options including the ability to import Adobe Acrobat (FDF) formatted files and to reply to FAA comments as described in the CPD, as revised. The FAA uses Adobe Acrobat 6.0 Professional or higher to search, compare, comment, and transmit (Export/Import) FDF and PDF files within FAA, to air carrier applicants, and other personnel involved in the certification. Individuals assigned to the certification must be proficient in the use of Adobe Acrobat 6.0 Professional or higher including, but not limited, to techniques of importing/exporting (FDF) files, generating and replying to comments as described in the CPD, as revised.

Operations Specifications may also be issued in electronic format. It would be beneficial for consultant personnel to understand the process for obtaining, maintaining, and distributing operations specifications in this way. Knowledge of electronic Industry Operations Specifications System (IOPSS) processes is not a requirement.

**6. Statement substantiating that the certification consultant meets specified eligibility requirements.**

The certification consultant program manager may make this statement in the cover letter of the application package.

**7. Supplemental statement including the names, signatures, and titles of those persons who will perform the authorized functions, and substantiating that they meet the eligibility requirements.**

Authorized functions are those functions and tasks that are required to be accomplished prior to the formal application meeting. All authorized persons must meet the eligibility requirements. The statement must identify by name the person meeting each specific requirement. Failure of a consultant group to maintain authorized personnel may result in removal from the list of FAA eligible certification consultants. If the certification consultant contracts with other persons or entities to meet the eligibility requirements, the contracts must be included in this application package.

**8. Written procedures and other documentation showing a methodology for air carrier process design and manual development. A complete understanding of air carrier systems, processes, and manual design is required.**

The consultant's internal documents or manual system will be the consultant's quality assurance and quality control documents.

This eligibility requirement comprises two very important documents developed for the application package. First, a document or manual must be developed by the certification consultant to show his/her process for documenting air carrier systems. For example, after air carrier personnel describe in detail how they intend to accomplish specific tasks, the consultant must have a written process to document this. The content of this submission must show a method to document how the people, facilities, hardware, software, etc., of each specific task within each airline system interrelate. Obviously, the complexity and interrelationships within and between each airline system must be understood before development of the manual system begins.

The second required document or manual submitted during application must contain air carrier manual development methodologies and procedures. Once air carrier systems are understood and documented by the consultant group, specific air carrier policies, procedures, and system safety principles must be applied to create a simple, clear, and usable airline manual system. In addition, the document must describe in detail how quality audits will be performed prior to Formal Application. FAA personnel will evaluate the manual development methodology to assure it can be applied to subsequent air carrier projects.

The final objective of the consultant's internal processes is to assure a standardized method to design air carrier systems and manuals from one certification project to the next. It should also assure a standardized method to verify the manuals meet FAA and customer requirements.

**9. Statement attesting complete understanding of air carrier systems, processes, and manual design**

The certification consultant program manager will submit a statement attesting that all personnel collectively have an understanding of air carrier systems, processes, and manual design. This statement is intended to assure that the certification consultant program manager has compiled a group with the required eligibility qualifications and conducted the appropriate background research. This statement may be made in the cover letter of the application package.

**10. Names, addresses, telephone numbers, or other contact information for at least three references.**

Reference information must be submitted to substantiate that the eligibility requirements are met. FAA will research and validate the information provided in the application package for each person conducting an authorized function.

**11. A certification that to the best of its knowledge and belief, the persons serving as management of the organization have not been convicted of, or had a civil or administrative finding rendered against them for: commission of fraud, embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property.**

The certification consultant program manager must provide a signed certification after performing appropriate background checks with no negative findings. This statement may be made in the cover letter of the application package.

**Submit the completed application to:**

FAA Flight Standards Certification and Surveillance Division  
Attn: ATOS CMO / Certification Consultant Agreements  
45005 Aviation Drive, Suite 131,  
Dulles, VA 20166.

After the application has been received, AFS-900 personnel will review the required attachments for completeness. Missing documentation or information will result in the return of the package.

If all eligibility requirements are met, an interview will be scheduled with the applicant. A notification letter will provide information on the location and how the interview will be conducted. During the interview, the consultant group will show FAA personnel how they meet the requirements. All personnel required to perform the authorized functions will be interviewed.

Appendix A contains a tool that should be used to prepare for the interview. The actual interview questions will be sent to the certification consultant applicant prior to the interview.

The applicant will receive a comprehensive debriefing following the interview, and if satisfactory, the AFS-900 Certification Consultant Seminar will be scheduled. If unsatisfactory, specific remedial action will be discussed so the applicant can proceed after the unsatisfactory items have been addressed.

After attending the seminar, arrangements will be made for the certification consultant program manager of the consulting group to sign the Agreement.

Once the Agreement is signed, the consulting group's name and contact information will be posted on the FAA's Web site.



## **Contracting Out To Meet Eligibility Requirements**

A certification consultant group may be established by formal contractual relationships between qualified persons or companies to meet eligibility requirements. For example, a professional manual development company may contract with individuals who possess the aeronautical experience contained in Article V of the agreement or vice-versa.

The FAA requires that a statement be submitted listing the names, signatures, and titles of those persons who will meet the eligibility requirements. During the application process, each contract will be reviewed to determine whether the contractor meets the eligibility requirements. The FAA must be notified, in writing, if there are any changes to personnel after a determination has been made that the group, as a whole, meets the requirements. The termination of any contractual agreement that results in the consultant group being unable to meet the requirements may be cause for termination of the agreement.

## **Notifications to FAA**

The certification consultant Program Manager must provide written notification to AFS-900 within ten working days that a contract has been negotiated and signed with a CFR part 121 air carrier applicant to provide services as a certification consultant. The notification allows FAA to provide assistance during the first project to assure subsequent formal application packages can be developed in a consistent manner that meets all FAA certification standards. Additionally, this notification will assist FAA in obtaining vital information on the program's effectiveness.

The certification consultant program manager must provide written notification to AFS-900 within ten working days that the certification consultant no longer meets the eligibility requirements. This includes the termination of any person or persons who are needed to meet the minimum certification consultant requirements.

The certification consultant program manager must provide written notification to AFS-900 within ten working days when terminating any relationship as a Certification Consultant with an air carrier applicant.

The certification consultant program manager should provide notification to the AFS-900 if disagreements cannot be resolved with the air carrier applicant that may affect the quality of the certification process. It is recommended the AFS-900 be informed of any situation that may place the certification consultant's qualification and eligibility in jeopardy.

## **Duration and Renewal Criteria**

Unless terminated or renewed in due course, the Agreement remains in effect for twenty-four (24) months after the month in which it was signed. The Agreement may be renewed every twenty-four months.

The Parties may terminate this Agreement at any time by giving at least thirty (30) days notice in writing to the other party.

Ninety (90) days prior to the renewal date, a certification consultant seeking renewal must submit a written request for renewal to AFS-900. If the manager of AFS-900 approves the request for renewal, the certification consultant will remain on the FAA qualified list.

In addition to the qualifications stated in the agreement, a certification consultant must have been actively engaged in at least one part 121 certification project during the previous twenty-four months.

In addition to the qualifications stated in the agreement, in order to be renewed, a certification consultant must also attend, or have attended, any mandatory and applicable refresher training scheduled by AFS-900.

## **Periodic FAA Assessments to Maintain Web Site Listing Eligibility**

### **A certification consultant agrees to initial and recurring assessments by the FAA.**

Once qualified and found eligible as a certification consultant, the FAA may periodically assess the certification consultant's progress during the first certification project. The intent of the assessment is to determine if the consultant is progressing in a manner that will result in an acceptable submission. Additionally, this assessment will help the FAA obtain vital information on the program's effectiveness.

AFS-900 may periodically contact the consultant group to sample the air carrier system development process. The expectation is that all future air carrier process systems and manuals will be developed using the demonstrated methodology.

**Failure of a certification consultant to adequately train the air carrier applicant on the certification process and to prepare them for the formal application meeting (e.g., if the applicant's submissions required major revisions) could result in an unsatisfactory evaluation.**

During the AFS-900 Certification Consultant seminar, every consultant will receive information as to what constitutes unsatisfactory preparation. Some examples of poor preparation may be the failure to perform a quality audit of the air carrier system and manual system before submission to FAA. The FAA expects the certification consultant to perform a review similar to the FAA's SAI review to assure the highest quality submissions.

**An unsatisfactory evaluation of a certification consultant may result in termination or non-renewal of this Agreement.**

## **Termination of Agreement**

**The FAA may terminate this Agreement and remove the certification consultant from the FAA-qualified list if any of the following occur:**

- a) The consultant receives an unsatisfactory evaluation pursuant to Article VII.**
- b) The consultant fails to meet the continuing eligibility requirements stated above.**

Paragraph (a) is directed to situations where the certification consultant did an unprofessional job preparing the applicant for Formal Application. For example, the references in the Letter of Compliance did not match the actual reference location. Another example may be management personnel not meeting 14 CFR part 119 experience requirements. The FAA will consider careless errors or omissions in documents as an indication that quality audits were not performed.

Paragraph (b) states that the consultant group must meet all original designation eligibility requirements at all times. If a certification consultant fails to meet the eligibility requirements, the FAA and the air carrier applicant must be notified within ten working days. The consultant group should provide the FAA with a corrective plan to avoid being removed from the Website.

# APPENDIX A

## Interview Preparation Tool

**This tool should be used by certification consultant applicants to prepare for the Interview.**

- Do you understand all of the information within the certification consultant agreement?
- Do you acknowledge your responsibilities in fulfilling all of the applicable requirements of the certification consultant agreement?
- Do you have a policy and procedures manual?
- Describe how you will handle air carrier applicant certification complaints.
- Describe and demonstrate your ability to apply Flight Standards System Safety processes, including Risk Management to air carrier manual design. FAA Order 8400.10 Appendix 6, and Certification Process Document (CPD)
- Demonstrate and describe each step of the Flight Standards Certification Process Document (CPD), as revised, to include the individual appendices.
- Describe how each document will be developed for Formal Application.
- Do you employ adequate, qualified, and certified operations and airworthiness personnel qualified through training, experience, and expertise in 14 CFR part 121 air carrier operations, or equivalent experience?
- Describe or elaborate on past and recent experiences.
- Describe and demonstrate your automation capabilities (**NOTE: Refer to CPD as revised for current requirements**).
- Describe and demonstrate your proposed procedures for certification process system design and development.
- Describe and explain who will accomplish the actual work (Include sub-contractors; describe the scope, and detail of their work).
- Describe how the Safety Attribute Inspections (SAIs) will be incorporated within the Air carrier applicant process system.
- Describe what is required to be included within a Compliance Statement.

- Describe and demonstrate the development and use of a Compliance Statement (LOC).
- Describe the purpose, use, and intent of a Safety Attribute Inspection (SAI).
- Describe how your organization will use the SAI in a System Safety Audit/review.
- Describe and demonstrate how your organization will verify and validate the Applicant Carriers Key Personnel qualifications, and experience requirements.
- State or describe who within the certification consultant organization will be guiding the Applicant Carrier through the Development Process.
- Describe or explain how your organization will apply the corporate culture of the air carrier applicant and ensure it is incorporated into the process engineering of the process.
- Describe and explain the size and scope of your organization and facility, including an organization chart or structure.
- Describe your lines of communication and/or protocol when interacting with the Applicant Carrier or Federal Aviation Administration.
- Describe and explain how you will notify the Air carrier applicant and the Federal Aviation Administration about Key Personnel changes.
- Describe and demonstrate your knowledge of the Operations Specifications.